

SueSteib.041306

1

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

OLIVIA Y., ET AL.

PLAINTIFFS

VERSUS

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, ET AL.

DEFENDANTS

DEPOSITION OF DR. SUE STEIB

Deposition Taken at the Instance of Plaintiffs  
In the Offices of Bradley, Arant, Rose & White  
Jackson, Mississippi  
On April 13, 2006  
Commencing at 8:45 a.m.

REPORTED BY: CHERIE G. BOND, RMR  
Mississippi CSR #1012

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2

APPEARANCES:

MS. SUSAN LAMBAISE  
Children's Rights  
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REPRESENTING PLAINTIFFS  
Page 1



SueSteib.041306

12 would be looking at how much time things take for a  
13 worker to get the job done. Is that right?

14 A Looking at the activities that they're  
15 expected to do, to perform individual job functions,  
16 however those are broken down, in a particular agency  
17 and the time that it takes to do those.

18 Q Okay. And a lot of your work in this report  
19 is about that workload study. Is that right?

20 A Yes.

21 Q Okay. And you didn't report on case loads  
22 based on the data, though, in your report?

23 A I believe we just give a range.

24 Q Okay. And is that range based on your  
25 interviews, or is that range based on the data?

46

1 A Based on both.

2 Q Okay. Because -- I'm asking because I  
3 didn't -- I didn't see any list of the data that you  
4 utilized, and I didn't get any data in the information  
5 that we got in our request for production of documents  
6 in the production back. Did you save all the  
7 materials that you looked at in preparing your report?

8 A We did a request for documents, yes.

9 Q Did you save all the materials that you --

10 A Oh. yes.

11 Q -- got? And did you turn it over to  
12 counsel?

13 A I turned over everything to counsel that I  
14 understood we were supposed to turn over to counsel.

15 Q Okay. Did you turn over the data that you  
16 looked at?

17 A No, I did not understand we were supposed to

SueSteib.041306

18 turn over data documents that were produced by DHS,  
19 that we were to turn over our documents.

20 Q Okay.

21 MS. LAMBIASE: I will state for the record  
22 that -- that we are requesting any and all documents  
23 that the expert looked at. It's clearly --

24 MS. RACHAL: We'll produce any responsive  
25 documents.

47

1 MS. LAMBIASE: Thank you.

2 A I thought DHS turned that over. All right.

3 BY MS. LAMBIASE:

4 Q No.

5 MS. RACHAL: We did turn it over.

6 MS. LAMBIASE: Not in context of what the  
7 expert looked at.

8 BY MS. LAMBIASE:

9 Q Did you find the data to be problematic in  
10 any way, the case load data? Was it difficult? Was  
11 it unreliable? Was it problematic in any other way?

12 MS. RACHAL: Objection to form.

13 A I can't say whether or not it was reliable.

14 BY MS. LAMBIASE:

15 Q Did you talk to anybody about whether it was  
16 reliable, any of the people you interviewed in your  
17 focus groups and conference calls and interviews and  
18 surveys?

19 A I'm not sure -- we talked about -- I was  
20 trying to think of some of the documents. The data  
21 documents I discussed with the person who gave me the  
22 data documents.

23 Q And did you discuss whether -- their